

**Abdul Hassan Law Group, PLLC
215-28 Hillside Avenue
Queens Village, New York, 11427**

Abdul K. Hassan, Esq.
Email: abdul@abdulhassan.com
Employment and Labor Lawyer

Tel: 718-740-1000
Fax: 718-740-2000
Web: www.abdulhassan.com

April 15, 2025

Via ECF

Hon. Jesse M. Furman, USDJ
United States District Court, SDNY
40 Foley Square
New York, NY 10007

Re: Simoni v. The First Rate Group LLC et al
Case No. 24-CV-05784 (JMF)(RWL)
Response to ECF No. 39 to 42, etc.

Dear Judge Furman:

My firm represents plaintiff in the above-referenced action, and I respectfully write in response to the motion of Defendant Quality Concierge Services Inc at ECF Nos. 39-42. Said motion seeks to invoke a collective bargaining agreement to compel mediation through the union. Without agreeing the points and arguments set forth in the motion, we are not opposed to the Court staying this case and referring it to the mediation process set forth in the CBA – the claims against the other Defendants The First Rate Group LLC and First Rate Maintenance LLC were already resolved through settlement that was approved by the Court. (See ECF No. 35).

By way of clarification, Plaintiff is not consenting to arbitration and is only consenting to union mediation requested in the notice of motion.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan
By: Abdul K. Hassan, Esq. (AH6510)
Counsel for Plaintiff

cc: Defense Counsel via ECF

Defendant's motion to compel mediation pursuant to the collective bargaining agreement, *see* ECF No. 39, is hereby GRANTED as unopposed. The case is hereby STAYED pending the mediation and the pretrial conference currently scheduled for April 30, 2025, is hereby ADJOURNED *sine die*. The parties shall file a joint letter updating the Court on the status of mediation no later than **July 15, 2025**. The Clerk of Court is directed to terminate ECF No. 39.

SO ORDERED.